

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN**

IN THE MATTER OF:

PATSY J. PIERSON,

Debtor.

Case No.: 14-05033

Chapter 13 - Filed: 07/29/2014

Converted Ch. 7 - 10/06/2014

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**APPLICATION FOR FINAL CHAPTER 7 FEES  
AND EXPENSES OF RAYMAN & KNIGHT,  
ATTORNEYS FOR THOMAS A. BRUINSMA, TRUSTEE**

NOW COMES Rayman & Knight, and for its Application for Final Chapter 7 Fees and Expenses of Rayman & Knight, Attorneys for Thomas A. Bruinsma, Trustee ("Application"), says as follows:

1. That it is the duly appointed and acting attorneys for the Trustee with respect to the above-captioned Chapter 7 proceeding.
2. That it has acted as attorneys for the Trustee since December 10, 2014 in this case.
3. That it has incurred certain fees and expenses in connection with this estate.
4. That the hourly rates of the professional performing services in this estate were as follows: Steven L. Rayman (SLR), \$295.00 and Cody H. Knight (CHK), \$250.00.
5. That the fees and expenses that are the subject to this Application generally related to the following matters:
  - a. Assistance to the Trustee with respect to the marshaling of non-exempt assets of the estate; and
  - b. Miscellaneous matters pertaining to the administration of the estate.

6. That the fees and expenses were incurred by your Applicant from December 10, 2014 through October 19, 2019 and are summarized below:

<u>Fees Incurred</u>	<u>Expenses Requested</u>	<u>Fees Previously Allowed by Court</u>
\$5,560.00	\$192.96	\$0.00
Total Amount to Be Approved & Paid:		\$5,752.96

7. That the attached Exhibit "A" is an itemization and breakdown of the services and expenses.

8. That said fees and expenses were reasonable, necessary and were of benefit to the estate and resulted in a recovery in excess of \$20,000.00.

9. That this Court ought enter an Order authorizing and allowing fees and expenses in the amount of \$5,752.96.

**WHEREFORE**, your Applicant prays:

A. That this Court issue an Order authorizing and allowing fees and expenses in the amount of \$5,752.96.

B. That this Court issue an Order authorizing Trustee to pay the sum of \$5,752.96 from the estate to Rayman & Knight.

C. That this Court grant such other relief as it finds just and equitable.

**RAYMAN & KNIGHT**

Attorneys for Thomas A. Bruinsma, Trustee

Dated: October 24, 2019

By:



Steven L. Rayman (P30882)

BUSINESS ADDRESS:

141 E. Michigan Avenue, Suite 301

Kalamazoo, MI 49007

Telephone: (269) 345-5156

RAYMAN & KNIGHT  
 141 E MICHIGAN AVE SUITE 301  
 KALAMAZOO, MI 49007  
 (269) 345-5156

Invoice submitted to:  
 PATSY PIERSON (BRUINSMA)  
 C/O THOMAS A. BRUINSMA  
 GRAND RAPIDS, MI 49546

October 22, 2019

Invoice #92990

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
12/10/2014	SLR DRAFT APPLICATION FOR APPOINTMENT, DECLARATION, PROPOSED ORDER.	0.20 295.00/hr	59.00
	SLR DRAFT COMPREHENSIVE LETTER TO ATTORNEY FOR DEBTOR RE: TREATMENT OF LAWSUIT.	0.30 295.00/hr	88.50
1/10/2015	SLR REVIEW COMPLAINT RE: IN RE BOSTON SCIENTIFIC CORP. PELVIC REPAIR.	0.20 295.00/hr	59.00
	SLR DRAFT CORRESPONDENCE TO LITIGATION COUNSEL RE: BANKRUPTCY MATTERS.	0.20 295.00/hr	59.00
3/22/2015	SLR REVIEW CORRESPONDENCE FROM CLIENT RE: STATUS OF MASS TORT LITIGATION, INSTRUCTIONS TO STAFF RE: SAME.	0.20 295.00/hr	59.00
5/13/2015	SLR CONFERENCE WITH ATTORNEY FOR DEBTOR (RE: MASS TORT MATTER), RE: LAWSUIT AS PROPERTY OF THE ESTATE, NEED TO CONTACT TRUSTEE.	0.20 295.00/hr	59.00
	SLR DRAFT LETTER TO CLIENT RE: STATUS OF NON-EXEMPT ASSET.	0.10 295.00/hr	29.50
5/31/2015	SLR CONFERENCE WITH CLIENT RE: EXEMPTION PROBLEMS.	0.20 295.00/hr	59.00
6/1/2015	SLR REVIEW CLIENT'S FORM 1, DRAFT LETTER TO ATTORNEY JOHNSON RE: EXEMPTION ISSUES, PRODUCT LIABILITY MATTERS.	0.30 295.00/hr	88.50
6/2/2015	SLR CONFERENCE WITH ATTORNEY KIRKENDALL RE: STATUS OF PRODUCTS LIABILITY MATTER.	0.20 295.00/hr	59.00





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		<u>Hrs/Rate</u>	<u>Amount</u>
6/2/2015	SLR DRAFT COMPREHENSIVE LETTER TO CLIENT RE: STATUS OF PRODUCTS LIABILITY MATTER, RECOMMENDATION FOR RESOLUTION.	0.30 295.00/hr	88.50
6/15/2015	SLR CONFERENCE WITH CLIENT RE: SETTLEMENT OF CLASS ACTION SUIT, OFFER ISSUES.	0.20 295.00/hr	59.00
	SLR CONFERENCE WITH ATTORNEY FOR DEBTOR.	0.30 295.00/hr	88.50
6/18/2015	SLR CONFERENCE WITH ATTORNEY FOR DEBTOR RE: CLASS ACTION MATTERS.	0.20 295.00/hr	59.00
6/22/2015	SLR DRAFT LETTER TO SPECIAL COUNSEL RE: APPOINTMENT MATTERS, RETAINER MATTERS.	0.20 295.00/hr	59.00
	SLR DRAFT APPLICATION FOR APPOINTMENT OF SPECIAL COUNSEL, DECLARATION, PROPOSED ORDER.	0.20 295.00/hr	59.00
	SLR DRAFT LETTER TO ATTORNEY JOHNSON RE: SPLIT OF PROCEEDS, APPOINTMENT OF SPECIAL COUNSEL, TAX REFUND MATTERS.	0.20 295.00/hr	59.00
10/4/2015	SLR CONFERENCE WITH CLIENT RE: SPECIAL COUNSEL, EXEMPTION ISSUES.	0.20 295.00/hr	59.00
10/5/2015	SLR DRAFT LETTER TO ATTORNEYS FOR DEBTOR RE: EXEMPTION, APPOINTMENT OF SPECIAL COUNSEL, LAWSUIT MATTERS.	0.30 295.00/hr	88.50
	SLR FIRST DRAFT, STIPULATION RESOLVING ESTATE'S RIGHT, TITLE AND INTEREST IN CAUSE OF ACTION.	0.30 295.00/hr	88.50
	SLR FIRST DRAFT, MOTION FOR TURNOVER.	0.40 295.00/hr	118.00
10/16/2015	SLR REVIEW CORRESPONDENCE FROM SPECIAL COUNSEL REGARDING APPLICATION FOR APPOINTMENT, REVIEW APPLICATION, DRAFT CORRESPONDENCE TO CLIENT REGARDING SAME.	0.10 295.00/hr	29.50
10/17/2015	SLR CONFERENCE WITH TRUSTEE REGARDING LAWSUIT ISSUES, PROCEEDS MATTERS, DRAFT CORRESPONDENCE TO ATTORNEY FOR DEBTOR REGARDING SAME.	0.20 295.00/hr	59.00
10/22/2015	SLR REVIEW MISCELLANEOUS DOCUMENTATION PERTAINING TO LAWSUIT MATTERS, REVIEW AND REVISE STIPULATION.	0.80 295.00/hr	236.00
12/31/2015	SLR DRAFT CORRESPONDENCE TO ATTORNEY FOR DEBTOR RE: COUNTEROFFER.	0.20 295.00/hr	59.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/31/2015	SLR REVIEW FILE RE: DEBTOR'S COUNTEROFFER, CONFERENCE WITH CLIENT RE: SAME.	0.30 295.00/hr	88.50
2/10/2016	SLR REVIEW FILE IN PREPARATION FOR CONFERENCE CALL WITH ATTORNEY JOHNSON RE: TERMS OF STIPULATION.	0.20 295.00/hr	59.00
2/11/2016	SLR DRAFT LETTER TO CLIENT RE: MODIFICATIONS TO STIPULATION, APPROVAL MATTERS.	0.20 295.00/hr	59.00
	SLR CONFERENCE WITH ATTORNEY FOR DEBTOR RE: RESOLUTION OF MATTER, MODIFICATIONS TO STIPULATION.	0.30 295.00/hr	88.50
4/16/2016	SLR DRAFT CORRESPONDENCE TO ATTORNEY KIRKENDALL RE: STATUS OF LITIGATION.	0.10 295.00/hr	29.50
	SLR CONFERENCE WITH CLIENT RE: STATUS OF MATTER, DRAFT CORRESPONDENCE TO ATTORNEY JOHNSON RE: SAME.	0.20 295.00/hr	59.00
5/12/2016	SLR REVIEW MEMORANDUM RE: STATUS OF MATTER.	0.10 295.00/hr	29.50
	SLR REVIEW FILE, REVIEW PENDING STIPULATION, DRAFT CORRESPONDENCE TO ATTORNEY FOR DEBTOR RE: SAME.	0.40 295.00/hr	118.00
6/5/2016	SLR REVIEW CORRESPONDENCE FROM CLIENT RE: AGREEMENT MATTERS, CLAIMS' ISSUES.	0.20 295.00/hr	59.00
6/20/2016	SLR CONFERENCE WITH ATTORNEY FOR DEBTOR RE: SETTLEMENT ISSUES.	0.10 295.00/hr	29.50
	SLR FIRST DRAFT, MOTION FOR APPROVAL OF STIPULATION, PROPOSED ORDER.	0.60 295.00/hr	177.00
6/23/2016	SLR REVIEW MODIFIED STIPULATION, REVIEW PROPOSED ORDER GRANTING MOTION FOR APPROVAL OF STIPULATION.	0.20 295.00/hr	59.00
6/28/2016	SLR REVIEW FILE RE: STATUS OF TORT LITIGATION, DRAFT LETTER TO SPECIAL COUNSEL RE: SAME.	0.30 295.00/hr	88.50
7/11/2016	SLR REVIEW CORRESPONDENCE FROM SPECIAL COUNSEL RE: STATUS OF MATTER, DRAFT CORRESPONDENCE TO CLIENT RE: SAME.	0.20 295.00/hr	59.00
7/23/2016	SLR REVIEW CORRESPONDENCE FROM CLIENT, CONFERENCE WITH CLIENT RE: TAX RETURN ISSUES, DRAFT SUBPOENA.	0.20 295.00/hr	59.00
8/8/2016	SLR REVIEW ORDER APPROVING STIPULATION RESOLVING ESTATE'S RIGHT, TITLE AND INTEREST IN CAUSE OF ACTION, DRAFT CORRESPONDENCE TO ATTORNEY FOR DEBTOR, SPECIAL COUNSEL RE: SAME	0.20 295.00/hr	59.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/10/2016	SLR REVIEW CORRESPONDENCE FROM ATTORNEY JOHNSON RE: TAX RETURN MATTERS, DRAFT CORRESPONDENCE IN RESPONSE.	0.20 295.00/hr	59.00
9/10/2018	SLR CONFERENCE WITH CLIENT RE: MISCELLANEOUS MATTERS.	0.10 295.00/hr	29.50
	SLR CONFERENCE WITH ANGELA AT KIRKENDALL DWYER RE: SETTLEMENT MATTERS.	0.20 295.00/hr	59.00
	SLR DRAFT CORRESPONDENCE TO KIRKENDALL DWYER RE: SETTLEMENT MATTERS.	0.20 295.00/hr	59.00
	SLR DRAFT CORRESPONDENCE TO CLIENT RE: SETTLEMENT STATUS, PROTOCOL.	0.20 295.00/hr	59.00
9/18/2018	SLR DRAFT ADDITIONAL CORRESPONDENCE TO ATTORNEY KIRKENDALL RE: SETTLEMENT PROCEEDS.	0.20 295.00/hr	59.00
9/22/2018	SLR CONFERENCE WITH CLIENT RE: CLAIMS' MATTERS, REVIEW CLAIMS.	0.20 295.00/hr	59.00
	SLR DRAFT CORRESPONDENCE TO ATTORNEY FOR DEBTOR RE: CLAIMS' MATTERS.	0.20 295.00/hr	59.00
9/29/2018	SLR DRAFT CORRESPONDENCE TO TROTT LAW RE: UNSECURED DEFICIENCY CLAIM MATTER.	0.20 295.00/hr	59.00
1/10/2019	SLR CONFERENCE WITH ANGELA BRAVO AT KIRKENDALL DWYER RE: SETTLEMENT STATEMENT.	0.30 295.00/hr	88.50
	SLR REVIEW CORRESPONDENCE FROM KIRKENDALL DWYER RE: SETTLEMENT OF TRANSVAGINAL MESH - BOSTON SCIENTIFIC, REVIEW CLOSING STATEMENT, "HOLD BACK" DOCUMENTATION, MISCELLANEOUS.	0.50 295.00/hr	147.50
1/11/2019	SLR CONFERENCE WITH CLIENT RE: DISTRIBUTION ISSUES.	0.10 295.00/hr	29.50
	SLR REVIEW FILE RE: DISTRIBUTION ISSUES, SETTLEMENT ISSUES, DRAFT LETTER TO ATTORNEY JOHNSON RE: SAME.	0.30 295.00/hr	88.50
	SLR CONFERENCE WITH ANGELA BRAVO AT KIRKENDALL DWYER RE: SETTLEMENT ISSUES.	0.30 295.00/hr	88.50
	SLR DRAFT COMPREHENSIVE LETTER TO TRUSTEE RE: DISTRIBUTION MATTERS.	0.30 295.00/hr	88.50
1/12/2019	SLR DRAFT CORRESPONDENCE TO SPECIAL COUNSEL RE: SETTLEMENT ISSUES.	0.20 295.00/hr	59.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
1/13/2019	SLR CONFERENCE WITH CLIENT RE: SETTLEMENT PROBLEMS, COMPROMISE MATTERS, APPROVAL MATTERS.	0.50 295.00/hr	147.50
2/14/2019	SLR REVIEW TRUSTEE'S FORM 1, REVIEW MISCELLANEOUS CORRESPONDENCE, CONFERENCE WITH ATTORNEY FOR DEBTOR RE: STATUS OF CASE.	0.20 295.00/hr	59.00
2/20/2019	SLR CONFERENCE WITH CLIENT RE: MOTION MATTERS.	0.10 295.00/hr	29.50
	SLR DRAFT CORRESPONDENCE TO SPECIAL COUNSEL RE: MOTION ISSUES.	0.20 295.00/hr	59.00
	CHK REVISE MOTION TO APPROVE SETTLEMENT AGREEMENT, MEETING WITH SLR RE: CLAIMS AND RELATED EXEMPTION SETTLEMENT. RAFT	0.40 250.00/hr	100.00
	CHK REVIEW FILE, DRAFT MOTION TO APPROVE SETTLEMENT.	0.60 250.00/hr	150.00
3/11/2019	SLR REVIEW CORRESPONDENCE FROM TEXAS COUNSEL RE: MODIFICATION TO MOTION, DRAFT CORRESPONDENCE TO CLIENT RE: SAME.	0.20 295.00/hr	59.00
	SLR REVIEW MODIFIED DRAFT OF MOTION TO APPROVE SETTLEMENT (DRAFTED BY SPECIAL COUNSEL), MAKE EDITS FOR DISCUSSION WITH TRUSTEE.	0.40 295.00/hr	118.00
3/14/2019	SLR MODIFY STIPULATION CONSISTENT WITH DISCUSSION WITH CLIENT, DRAFT CORRESPONDENCE TO SPECIAL COUNSEL RE: SAME.	0.30 295.00/hr	88.50
	SLR EXTENDED CONFERENCE WITH CLIENT RE: FORM OF MOTION FOR APPROVAL OF SETTLEMENT.	0.30 295.00/hr	88.50
4/5/2019	SLR FINAL REVIEW AND MODIFICATION TO PROPOSED MOTION FOR SETTLEMENT OF CLAIM.	0.20 295.00/hr	59.00
5/3/2019	SLR CONFERENCE WITH CLIENT RE: FOLLOW-UP MATTERS, SPECIAL COUNSEL MATTERS, DRAFT CORRESPONDENCE TO SPECIAL COUNSEL RE: SAME.	0.20 295.00/hr	59.00
5/23/2019	SLR CONFERENCE WITH CLIENT RE: FINAL FORM OF MOTION FOR SETTLEMENT.	0.20 295.00/hr	59.00
6/22/2019	SLR CONFERENCE WITH CLIENT RE: MODIFICATION OF PENDING MOTION, DRAFT MODIFICATION, CORRESPONDENCE TO ATTORNEY FOR DEBTOR RE: SAME.	0.30 295.00/hr	88.50
8/18/2019	SLR REVIEW ORDER GRANTING MOTION TO APPROVE SETTLEMENT, DRAFT CORRESPONDENCE TO SPECIAL COUNSEL RE: SAME.	0.20 295.00/hr	59.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/9/2019	SLR REVIEW CORRESPONDENCE FROM SPECIAL COUNSEL RE: SETTLEMENT MATTERS, CONFERENCE WITH CLIENT RE: SAME.	0.20 295.00/hr	59.00
10/11/2019	SLR DRAFT CORRESPONDENCE TO CLIENT RE: DISTRIBUTION OF HOLD BACK, MISCELLANEOUS MATTERS.	0.10 295.00/hr	29.50
	SLR REVIEW CORRESPONDENCE FROM SPECIAL COUNSEL RE: DISTRIBUTION "HOLD BACK", DRAFT CORRESPONDENCE TO ATTORNEY FOR DEBTOR RE: SAME.	0.20 295.00/hr	59.00
10/14/2019	SLR DRAFT APPLICATION FOR COMPENSATION, NOTICE, PROPOSED ORDER.	0.20 295.00/hr	59.00
10/19/2019	SLR REVIEW PACKET FROM SETTLEMENT AGENT, INCLUDING TENDER OF PAYMENT, ACCOUNTING, CONFERENCE WITH CLIENT RE: SAME.	0.30 295.00/hr	88.50
For professional services rendered		<u>19.00</u>	<u>\$5,560.00</u>

Additional Charges :

		<u>Qty/Price</u>	
12/18/2014	COPIES	2 \$0.20	0.40
	POSTAGE	1 \$0.48	0.48
12/30/2014	COPIES	4 \$0.20	0.80
	POSTAGE	1 \$0.48	0.48
3/23/2015	COPIES	2 \$0.20	0.40
	POSTAGE	1 \$0.48	0.48
6/11/2015	COPIES	1 \$0.20	0.20
	POSTAGE	1 \$0.49	0.49
10/14/2015	COPIES	2 \$0.20	0.40



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		<u>Qty/Price</u>	<u>Amount</u>
10/14/2015	POSTAGE	2 \$0.49	0.97
1/8/2016	COPIES	3 \$0.20	0.60
	POSTAGE	1 \$0.49	0.49
6/27/2016	POSTAGE	22 \$0.49	10.67
	COPIES	88 \$0.20	17.60
7/6/2016	COPIES	10 \$0.20	2.00
	POSTAGE	2 \$0.68	1.35
7/13/2016	COPIES	1 \$0.20	0.20
	POSTAGE	1 \$0.47	0.47
8/3/2016	PACER	10 \$0.10	1.00
8/15/2016	COPIES	4 \$0.20	0.80
	POSTAGE	2 \$0.47	0.93
2/20/2019	PACER	22 \$0.10	2.20
5/29/2019	POSTAGE	30 \$0.65	19.50
	COPIES	210 \$0.20	42.00
7/17/2019	PACER	18 \$0.10	1.80
	POSTAGE	29 \$0.65	18.85

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		<u>Qty/Price</u>	<u>Amount</u>
7/17/2019	COPIES	232 \$0.20	46.40
10/14/2019	COPIES	30 \$0.20	6.00
	POSTAGE	30 \$0.50	15.00
Total additional charges			<u>\$192.96</u>
For professional services rendered			<u>19.00</u> <u>\$5,752.96</u>

## User Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
CODY H. KNIGHT	1.00	250.00	\$250.00
STEVEN L. RAYMAN	18.00	295.00	\$5,310.00